

Application No. 10/523,786  
Amendment dated July 24, 2007  
Reply to Office Action of June 5, 2007

Docket No.: SON-2802

**AMENDMENTS TO THE DRAWINGS**

The attached sheet(s) of drawings includes changes to Figs. 5-8.

Attachment:      Replacement sheet  
                         Annotated sheet showing changes

### **REMARKS**

This amendment is a full and timely response to the Office Action dated June 5, 2007. Reexamination and reconsideration are respectfully requested.

The title and Figs. 5-8 of the specification have been amended in response to the objections raised in the June 5 Action. Additionally, claims 5-8 have been amended to recite “[a] program stored on a computer-readable medium for execution in a system” and thus claim statutory subject matter under 35 U.S.C. § 101.

Claims 1-12 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Applicant’s admission of prior art (“AAPA”) in view of U.S. Pat. No. 5,410,651 to Sekizawa et al. (“Sekizawa”). This rejection is respectfully traversed.

As noted in the June 5 Action, the AAPA does not teach that the instruction codes defined to be executed by separate processors are loaded into the internal memory separately.

Sekizawa teaches a distributed processing system in which a plurality of network-connected processing units performs computations and have the ability to transfer individual programs among each other utilizing network communications. (Sekizawa, Abstract). If an individual processor does not currently possess a required program, it can request that a different processor transmit it across the network. (Sekizawa, 4:18-5:3). Additionally, processors that are over- or under-utilized can request a transfer of programs between processors to more evenly distribute load. (Sekizawa, 5:38-7:4).

According to the June 5 Action: “Sekizawa teaches that each of a plurality of processors can load a corresponding program only when needed. As such, the program corresponding to each processor is loaded separately.” While this may be an accurate characterization of Sekizawa, it does not render Applicant’s claimed invention obvious.

First, a person having ordinary skill in the art would not be motivated to consider Sekizawa, as it addresses non-analogous art. See MPEP 2141.01(a)(V); *Wang Labs., Inc. v. Toshiba Corp.*, 993 F.2d 858, 26 USPQ2d 1767 (Fed. Cir. 1993). Sekizawa is in the field of

networked, independently functioning processor units with their own respective internal storage means for storing executable programs. (See Sekizawa, 2:56-58, 3:10-12, 4:58-5:3, and Figs. 5, 6, 9). By contrast, Applicant's invention is in the field of System-on-Chip ("SOC") technology. (Applicant's specification, page 1). In SOC technology, a plurality of processors and a memory are mounted on a single chip, the memory being shared by the plurality of processors. (Applicant's specification, page 1 and Figs. 1, 5, 7). This feature of Applicant's invention is clearly recited in the claims. For example, claim 1 recites "a processor including a plurality of central processing units and internal storage means." SOC technology presents unique design constraints and goals that the more general networked computer system of Sekizawa does not address. For example, memory capacity of the internal memory in a SOC system is extremely limited, requiring more efficient usage of the available storage. (See Applicant's specification, page 1). Furthermore, in a SOC system the plurality of processors must share a single address space, leading to intricacies in compilation that are not present in the more general networked computer system. (See Applicant's specification, pages 3-4, 10-12 and Figs. 2, 6). Thus, a person having ordinary skill would not have considered the teachings of Sekizawa when attempting to solve the previous problems associated with SOC devices.

Second, even if Sekizawa were to be considered analogous art, its combination with the AAPA would not put one in possession of Applicant's claimed invention. Simply acknowledging that one may desire to load separate programs corresponding to separate processors at separate times (as purportedly taught by Sekizawa), would not enable a person having ordinary skill in the art at the time Applicant's invention was made to have done so in a SOC system. As noted above, SOC systems present difficulties that are completely unaddressed by Sekizawa and that one having ordinary skill would not have overcome without undue experimentation.

In summary, Sekizawa is not a proper reference for a rejection under 35 U.S.C. § 103(a) because it is not analogous art. In the alternative, even if Sekizawa is appropriate under § 103(a), its combination with the AAPA would not have put the public in possession of the claimed

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invention. Therefore Applicant respectfully requests that this rejection under 35 U.S.C. § 103(a) be withdrawn.

In view of the above amendment, applicant believes the pending application is in condition for allowance.

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 18-0013, under Order No. SON-2802 from which the undersigned is authorized to draw.

Dated: July 24, 2007

Respectfully submitted,

By 

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Attachments

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**REPLACEMENT SHEET**

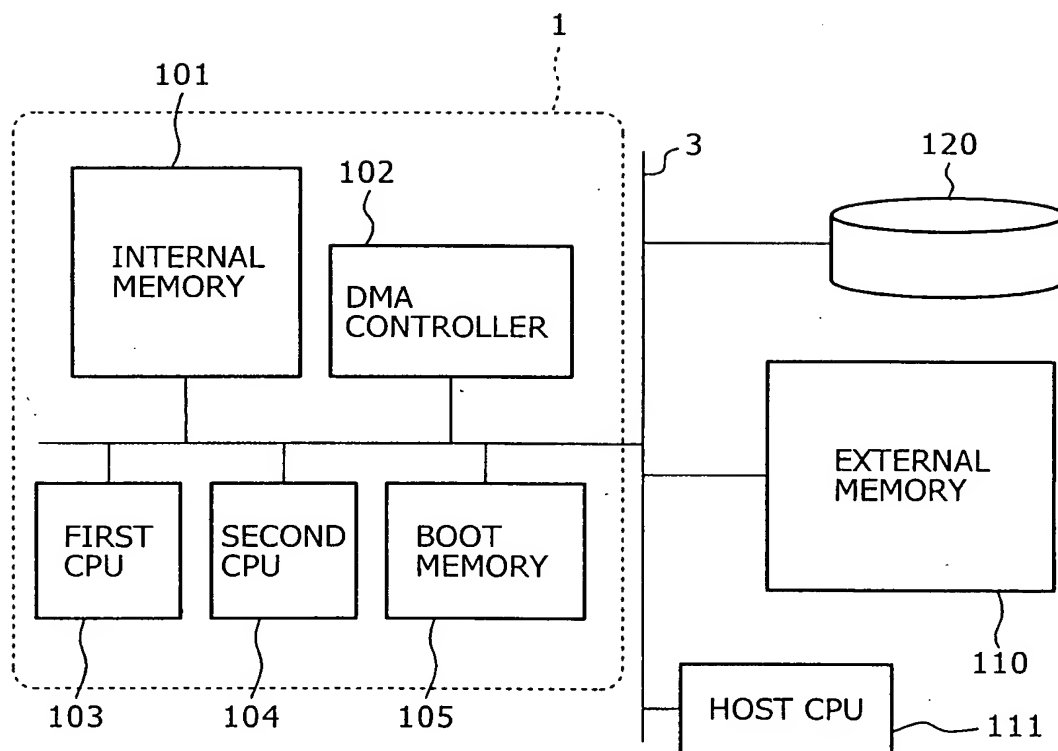
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**ANNOTATED SHEET SHOWING CHANGES**



FIG. 5



PRIOR ART



FIG. 6

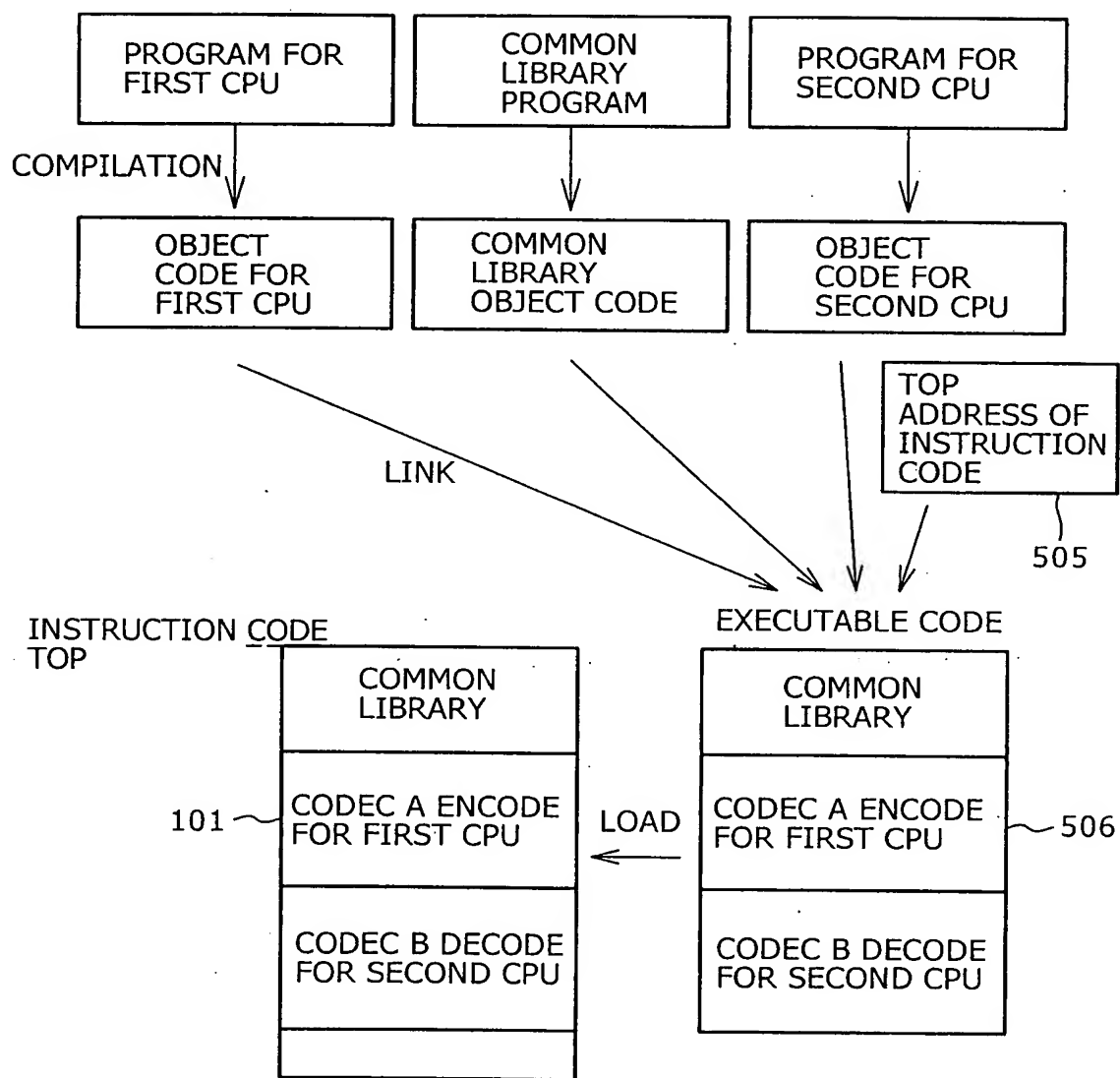
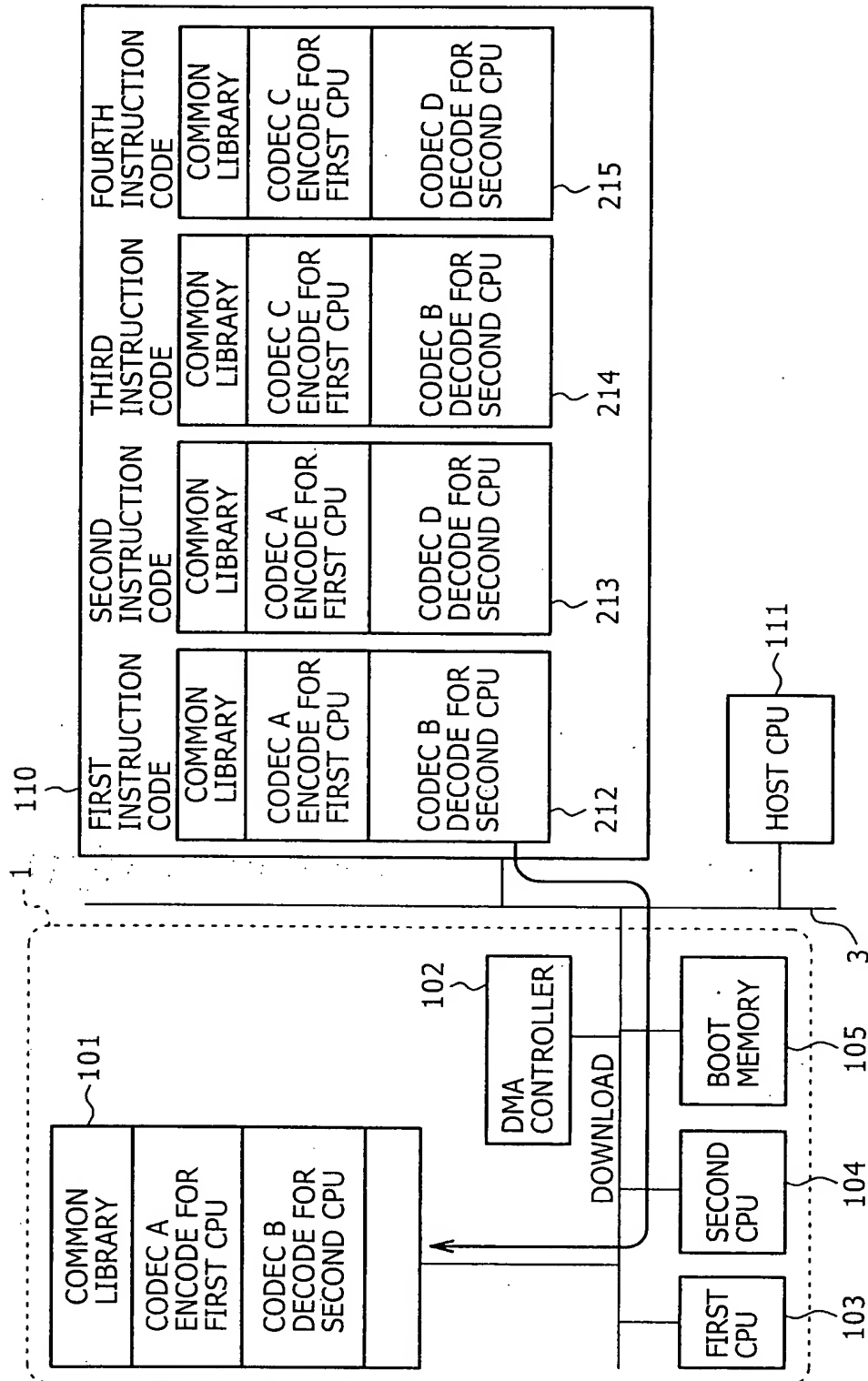




FIG. 7



PRIOR ART



FIG. 8

